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Environmental
Cleanup Office

January 30, 2009

Ms. Deb Yamamoto
U.S. EPA
1200 Sixth Avenue, Suite 900, M/S ECL-115
Seattle, Washington 98101

RE: Request for Extension in Responding to 104(e) Information
Shipyard-Commerce Center LLC
Portland, Oregon

Dear Ms. Yamamoto:

Shipyard Commerce Center LLC has been working since March 2008 to respond to the Environmental Protection Agency's (EPA) 104(e) information request for the Portland Shipyard. In May 2008 the EPA granted Shipyard Commerce Center an extension for submittal of the requested information until February 16, 2009. We are writing to request an extension of the submittal due date until June 30, 2009. An extension is needed for the following reasons:

- 1). We are working with the Port of Portland to complete our submission since the Port was also required by EPA to respond for our facility, and it has a contractual obligation to Shipyard Commerce Center to respond for a majority of the time period covered by the information request. The Port of Portland's resources are stressed by its workload of preparing its 104(e) response, as well as by other priorities, and it is unable to provide the information in a timeframe for us to meet the February 16th due date. Furthermore, we understand that the Port was granted an extension for submitting material on the Portland Shipyard until June 30, 2009. As such, information that makes a submittal complete for our facility will not be available until the Port has completed its response.
- 2). We have gathered and reviewed a significant amount of information, and are now struggling to reduce the volume of documents in our possession that we will submit into something that is both manageable and useful. We have multiple versions of material safety data sheets for a single product, and numerous drawings of the same item with only insignificant differences such as drawing numbers. While the EPA's 104(e) request states that all such documents in our possession should be produced, subsequent guidance from the Agency indicates that duplicative information is unwanted and unnecessary. Accordingly, we are attempting to sort the available information to minimize duplicity in our submittal. This effort is taking a significant amount of time, and granting the requested extension will assist us in producing a more useful work product.

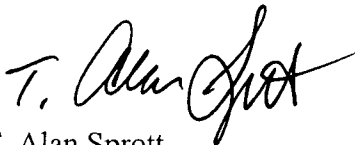
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3). To date, our consultants on the project have worked nearly 1,000 hours on the information request, with over 200 hours of support from key Shipyard Commerce Center staff who are spending more and more time on the project. As you know, many of the questions in the information request require significant input from individuals knowledgeable in the history and operation of a facility. We have one individual with the knowledge and qualifications to complete the detail work on this project. However, this individual is integral to the management of our company and has a broad range of responsibilities that are significant to our operations. For example, this individual has overall responsibility for maintenance of our Portland facility; is involved in our source control investigation under an agreement with the State of Oregon being performed in support of the Portland Harbor cleanup; is implementing our facility security plan required by the Maritime Transportation Security Act; is engaged in a major program to reduce particulate emissions from sandblasting; and oversees the support our daily environmental compliance and protection efforts associated with on-going ship repair operations at four facilities. Responding to the Agency's 104(e) information request has proven to be a significant task, and while we have accomplished much, finalizing our submittal is requiring a major effort. Granting this extension request will assist us greatly in meeting the operational needs of our business and in producing a more detailed submittal.

If you have questions or require additional information, please contact the undersigned at (503) 247-1672. We appreciate your consideration of our request.

Sincerely,

A handwritten signature in black ink, appearing to read "T. Alan Sprott". The signature is fluid and cursive, with the first name "T." and last name "Sprott" clearly distinguishable.

T. Alan Sprott
Vice President